

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

FRANK D. SEINFELD,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 05-298 (JJF)
)	
CRAIG R. BARRETT, CHARLENE)	
BARSHESKY, E. JOHN P. BROWNE,)	
D. JAMES GUZY, REED E. HUNDT,)	
PAUL S. OTELLINI, DAVID S. POTTRUCK,)	
JANE E. SHAW, JOHN L. THORNTON,)	
DAVID B. YOFFIE, ANDREW S. GROVE, and)	
INTEL CORPORATION,)	
)	
)	
Defendants.)	

**STIPULATION AND ORDER AUTHORIZING DEFENDANTS
TO FILE BRIEFS AND OTHER DOCUMENTS UNDER SEAL**

WHEREAS, plaintiff filed a Motion for Summary Judgment on June 7, 2005;

WHEREAS, defendants will be responding to plaintiff's Motion for Summary Judgment by filing answering briefs, declarations and documentary evidence on July 25, 2005;

WHEREAS, the documentation filed by defendants will include non-public proprietary information of Intel Corporation ("Intel") and personal financial information regarding the individual defendants;

WHEREAS, defendants believe that disclosure of such information will cause competitive injury to Intel as well as personal harm to the individual defendants; and

WHEREAS, the parties are in the process of negotiating a protective order:

IT IS HEREBY STIPULATED AND AGREED, by and among the parties, through their undersigned counsel, subject to Court approval, that:

1. Defendants may file their briefs, declarations and other supporting documents under seal.
2. All documents filed under seal shall remain under seal until further order of this Court.
3. Access to the documents filed under seal is limited to the Court, its personnel, and counsel for the parties in this action, as well as agents or experts of counsel for the parties, including but not limited to printers, provided that said agents or experts of counsel agree to keep the documents confidential.

FOX ROTHSCHILD LLP

POTTER ANDERSON & CORROON LLP

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Attorneys for Defendants

SO ORDERED this _____ day of _____, 2005.

691442

United States District Judge